

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

<b>IN RE:</b>	)	
<b>CAMP LEJEUNE WATER LITIGATION</b>	)	<b>7:23-cv-00897</b>
	)	
	)	
<b>This Document Relates To:</b>	)	<b>CONSENT MOTION TO</b>
	)	<b>COMPEL PLAINTIFF ANDREW</b>
<i>Andrew Przenkop v. United States of America</i>	)	<b>PRZENKOP’S DEPOSITION</b>
<b>Case No. 7:23-cv-1435</b>	)	<b>TESTIMONY</b>

Pursuant to Federal Rule of Civil Procedure 26 and Local Rule 7.1, the Parties move the Court for an order compelling Plaintiff Andrew Przenkop to testify regarding the reason he left his position with the Polk County Sheriff’s Office (the “Sheriff’s Office”), including testimony related to a settlement with the Sheriff’s Office that included a confidentiality agreement. The Parties have met and conferred; the United States is authorized to represent that Plaintiff consents to the relief requested.

In support of this Motion, the Parties submit and rely upon the accompanying Memorandum in Support attached hereto.

Dated: May 23, 2024

Respectfully Submitted,

**THE UNITED STATES OF AMERICA**

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN  
Director, Torts Branch

BRIDGET BAILEY LIPSCOMB  
Assistant Director

ADAM BAIN  
Special Litigation Counsel

KAILEY SILVERSTEIN  
Trial Attorney

/s/ Nathan J. Bu  
NATHAN J. BU  
Trial Attorney, Torts Branch  
Environmental Torts Litigation Section  
U.S. Department of Justice  
P. O. Box 340, Ben Franklin Station  
Washington, D.C. 20044  
E-mail: [nathan.j.bu@usdoj.gov](mailto:nathan.j.bu@usdoj.gov)  
Telephone: (202) 705-5938  
Fax: (202) 616-4989  
*Counsel for the United States*

Attorney inquiries to DOJ regarding CLJA:  
(202) 353-4426

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2024, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

/s/ Nathan J. Bu  
Nathan J. Bu